

PRH
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CJR/SM:USAO#2013R00259

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2013 SEP 24 P 4:42

CLERK'S OFFICE
AT BALTIMORE

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UNITED STATES OF AMERICA

v.

ANTOINE WIGGINS,
a/k/a "Twizzy,"

ENZO BLANKS,
a/k/a "Zo,"

ANTHONY MILES,
a/k/a "Bigs,"
a/k/a "Fat Boy,"

MARLOW BATES,
a/k/a "Low,"

TYRIE COY AMOS,

ROBERT LOMAX, III,

KEYA RENEE DEAN,

DONTE THOMAS,
a/k/a "Cruddy,"

ANDRE CARTER,
a/k/a "Dre,"

VIRGINIA MOORE,
a/k/a "Miss V,"

RANDY ADKINS,

REBECCA BELETE,

ABRAHAM GOODE,

JEFFREY JOHN LEE,

Defendants

CRIMINAL NO. *ELH-13-0512*
FILED UNDER SEAL

(Conspiracy to Distribute and Possess
with Intent to Distribute Heroin, 21
U.S.C. § 846; Possession with Intent to
Distribute Heroin, 21 U.S.C. § 841;
Distribution of Heroin, 21 U.S.C. § 841;
Maintaining A Drug-Involved Premises;
21 U.S.C. § 856(a)(1); Felon In
Possession Of Ammunition, 18 U.S.C. §
922(g)(1); Aiding and Abetting, 18
U.S.C. § 2)

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

From in or about December 2011, and continuing through the date of this Indictment, in the District of Maryland and elsewhere,

**ANTOINE WIGGINS,
a/k/a "Twizzy,"**

**ENZO BLANKS,
a/k/a "Zo,"**

**ANTHONY MILES,
a/k/a "Bigs,"
a/k/a "Fat Boy,"**

**MARLOW BATES,
a/k/a "Low,"**

TYRIE COY AMOS,

ROBERT LOMAX, III,

KEYA RENEE DEAN,

**DONTE THOMAS,
a/k/a "Cruddy,"**

**ANDRE CARTER,
a/k/a "Dre,"**

**VIRGINIA MOORE,
a/k/a "Miss V,"**

RANDY ADKINS,

REBECCA BELETE,

**ABRAHAM GOODE,
and
JEFFREY JOHN LEE,**

the defendants herein, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

21 U.S.C. § 846

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

On or about December 21, 2011, in the State and District of Maryland,

ENZO BLANKS,
a/k/a "Zo,"

the defendant herein, did knowingly, intentionally and unlawfully possess with the intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

On or about December 21, 2011, in the State and District of Maryland,

ENZO BLANKS,
a/k/a "Zo,"

the defendant herein, did knowingly, intentionally, and unlawfully use and maintain the premises at 118 N. Howard Street, Apartment 811, Baltimore, Maryland, for the purpose of manufacturing, distributing and using heroin, a Schedule I controlled substance.

21 U.S.C. § 856(a)(1)

18 U.S.C. § 2

COUNT FOUR

The Grand Jury for the District of Maryland further charges that:

On or about January 4, 2013, in the State and District of Maryland,

**ANTOINE WIGGINS,
a/k/a "Twizzy,"**

the defendant herein, did knowingly, intentionally and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

On or about April 10, 2013, in the State and District of Maryland,

ROBERT LOMAX, III,

the defendant herein, did knowingly, intentionally and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT SIX

The Grand Jury for the District of Maryland further charges that:

On or about April 10, 2013 in the State and District of Maryland,

ROBERT LOMAX, III,

the defendant herein, did knowingly, intentionally, and unlawfully use and maintain the premises at 603 Gold Street, Baltimore, Maryland, for the purpose of manufacturing, distributing and using heroin, a Schedule I controlled substance.

21 U.S.C. § 856(a)(1)

18 U.S.C. § 2

COUNT SEVEN

The Grand Jury for the District of Maryland further charges that:

On and about April 10, 2013, in the District of Maryland,

ROBERT LOMAX, III,

the defendant herein, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting commerce approximately 200 rounds of .22 caliber ammunition.

18 U.S.C. § 922(g)

COUNT EIGHT

The Grand Jury for the District of Maryland further charges that:

On or about August 2, 2013, in the State and District of Maryland,

ENZO BLANKS,
a/k/a "Zo,"

the defendant herein, did knowingly, intentionally and unlawfully distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT NINE

The Grand Jury for the District of Maryland further charges that:

On or about August 4, 2013, in the State and District of Maryland,

**ANTHONY MILES,
a/k/a "Bigs,"
a/k/a "Fat Boy,"**

the defendant herein, did knowingly, intentionally and unlawfully distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT TEN

The Grand Jury for the District of Maryland further charges that:

On or about August 4, 2013, in the State and District of Maryland,

JEFFREY JOHN LEE,

the defendant herein, did knowingly, intentionally and unlawfully possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)

18 U.S.C. § 2

COUNT ELEVEN

The Grand Jury for the District of Maryland further charges that:

On or about September 10, 2013, in the State and District of Maryland,

ENZO BLANKS,
a/k/a "Zo,"

the defendant herein, did knowingly, intentionally and unlawfully possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT TWELVE

The Grand Jury for the District of Maryland further charges that:

On or about September 10, 2013, in the State and District of Maryland,

**ENZO BLANKS,
a/k/a "Zo,"**

the defendant herein, did knowingly, intentionally and unlawfully use and maintain the premises at 301 W. Madison Avenue, Apartment 612 W., Baltimore, Maryland, for the purpose of manufacturing, distributing and using heroin, a Schedule I controlled substance.

21 U.S.C. § 856(a)(1)

18 U.S.C. § 2

COUNT THIRTEEN

The Grand Jury for the District of Maryland further charges that:

On or about September 10, 2013, in the State and District of Maryland,

REBECCA BELETE,

the defendant herein, did knowingly, intentionally and unlawfully possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT FOURTEEN

The Grand Jury for the District of Maryland further charges that:

On or about September 10, 2013, in the State and District of Maryland,

REBECCA BELETE,

the defendant herein, did knowingly, intentionally, and unlawfully use and maintain the premises at 301 W. Madison Avenue, Apartment 612 W., Baltimore, Maryland, for the purpose of manufacturing, distributing and using heroin, a Schedule I controlled substance.

21 U.S.C. § 856(a)(1)

18 U.S.C. § 2

FORFEITURE

The Grand Jury further finds that:

1. Pursuant to Title 21, United States Code, Section 853, upon conviction of one or more of the controlled substance offenses alleged in Counts One, Two, Four, Five, Eight, Nine, Ten, Eleven and Thirteen of this indictment, each defendant shall forfeit to the United States of America any property, real or personal, constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and any property, real or personal, used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations, including but not limited to:

- 2013 Honda Accord, VIN:1HGCT2B81DA001890, bearing Maryland license 80282CE,
- 2007 Jeep Wrangler, VIN 1J4GA39187L172823, bearing Maryland license 4BC7293,
- 2007 Mercedes Benz Brabus, VIN WDDEJ71X47A004781, bearing Maryland license 5AZ1570,
- 2007 Ford F150, Harley Davidson model, VIN 1FTRW12537FB49059, bearing Maryland license A198460,
- 2009 BMW, VIN 5UXFG83589LZ92913, bearing Maryland license 7AM5987,
- 2007 Bentley convertible, VIN SCBDR33W97C046446, bearing Maryland license plate 6AZ2001,
- 2011 Aston Martin Rapide, VIN SCFHDDAJ3BAF01116, bearing Maryland license plate 78539CE
- 33' Doral, Hull number CA-QJA01511A101

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property charged with forfeiture above.

3. As a result of the offense set forth in Count Seven of this indictment, the Defendant, Robert Lomax III, shall forfeit to the United States the ammunition identified in the indictment and involved in that offense.

21 U.S.C. § 853; 28 U.S.C. § 2461(c); Rule 32.2(a), Fed. R. Crim. P.; 18 U.S.C. § 924(d).


ROD J. ROSENSTEIN
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date:

9/24/13